

Bay Area Air Quality Management District

939 Ellis Street
San Francisco, CA 94109
(415) 771-6000

Final

MAJOR FACILITY REVIEW PERMIT

Issued To:
Crown Cork and Seal
Facility #A9814

Facility Address:
41099 Boyce Road
Fremont, CA 94538

Mailing Address:
41099 Boyce Road
Fremont, CA 94538

Responsible Official

E. John Pysar
1-215-698-5280

Facility Contact

John Jurinek, Plant Manager
1-510-656-8800

Type of Facility: Crown Cork and Seal

Primary SIC: 3411

Product: Metal Container and Closure Coating

BAAQMD Permit Division Contact:

Brenda Cabral

ISSUED BY THE BAY AREA AIR QUALITY MANAGEMENT DISTRICT

Signed by Ellen Garvey
Ellen Garvey, Executive Officer/Air Pollution Control Officer

February 24, 2000
Date

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I. STANDARD CONDITIONS

A. Administrative Requirements

The permit holder shall comply with all applicable requirements in the following regulations:

BAAQMD Regulation 1 - General Provisions and Definitions

(as amended by the District Board on 10/7/98);

SIP Regulation 1 - General Provisions and Definitions

(as approved by EPA through 8/27/99);

BAAQMD Regulation 2, Rule 1 - Permits, General Requirements

(as amended by the District Board on 10/7/98);

SIP Regulation 2, Rule 1 - Permits, General Requirements

(as approved by EPA through 2/25/99);

BAAQMD Regulation 2, Rule 2 - Permits, New Source Review

(as amended by the District Board on 10/7/98);

SIP Regulation 2, Rule 2 - Permits, New Source Review and Prevention of Significant Deterioration

(as approved by EPA through 2/25/99);

BAAQMD Regulation 2, Rule 4 - Permits, Emissions Banking

(as amended by the District Board on 10/7/98); and

SIP Regulation 2, Rule 4 - Permits, Emissions Banking

(as approved by EPA through 2/25/99).

B. Conditions to Implement Regulation 2, Rule 6, Major Facility Review

1. This Major Facility Review Permit was issued on January 7, 2000 and expires on December 31, 2004. The permit holder shall submit a complete application for renewal of this Major Facility Review Permit no later than June 30, 2004 and no earlier than December 31, 2003. **If a complete application for renewal has not been submitted in accordance with these deadlines, the facility may not operate after** December 31, 2004. (Regulation 2-6-307, 404.2, & 409.6; MOP Volume II, Part 3, §4.2)
2. The permit holder shall comply with all conditions of this permit. The permit consists of this document and all appendices. Any non-compliance with the terms and conditions of this permit will constitute a violation of the law and will be grounds for enforcement action; permit termination, revocation and re-issuance, or modification; or denial of a permit renewal application. (Regulation 2-6-307; MOP Volume II, Part 3, §4.11)
3. In the event any enforcement action is brought as a result of a violation of any term or condition of this permit, the fact that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with such term or condition shall not be a defense to such enforcement action. (MOP Volume II, Part 3, §4.11)
4. This permit may be modified, revoked, reopened and reissued, or terminated for cause. (Regulation 2-6-307, 409.8, 415; MOP Volume II, Part 3, §4.11)
5. The filing of a request by the facility for a permit modification, revocation and re-issuance, or termination, or of a notification of planned changes or anticipated non-

I. Standard Conditions

compliance does not stay the applicability of any permit condition. (Regulation 2-6-409.7; MOP Volume II, Part 3, §4.11)

6. This permit does not convey any property rights of any sort, nor any exclusive privilege. (Regulation 2-6-409.7; MOP Volume II, Part 3, §4.11)
7. The permit holder shall supply within 30 days any information that the District requests in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. (Regulation 1-441, Regulation 2-6-409.4 & 501; MOP Volume II, Part 3, §4.11)
8. Any records required to be maintained pursuant to this permit which the permittee considers to contain proprietary or trade secret information shall be prominently designated as such. Copies of any such proprietary or trade secret information which are provided to the District shall be maintained by the District in a locked confidential file, provided, however, that requests from the public for the review of any such information shall be handled in accordance with the District's procedures set forth in Section 11 of the District Administrative Code. (Regulation 2-6-419; MOP Volume II, Part 3, §4.11)
9. Proprietary or trade secret information provided to EPA will be subject to the requirements of 40 CFR Part 2, Subpart B - Public Information, Confidentiality of Business Information. (40 CFR Part 2)
10. The emissions inventory submitted with the application for this Major Facility Review Permit is an estimate of actual emissions for the time period stated and is included only as one means of determining applicable requirements for emission sources. It does not establish, or constitute a basis for establishing, any new emission limitations. (MOP Volume II, Part 3, §4.11)

C. Requirement to Pay Fees

The permit holder shall pay annual fees in accordance with District Regulation 3, including Schedule P. (Regulation 2-6-402 & 409.13, Regulation 3; MOP Volume II, Part 3, §4.12)

D. Inspection and Entry

Access to Facility: The permit holder shall provide reasonable access to the facility and equipment which is subject to this permit to the APCO and/or to his or her designee. (Regulation 1-440, Regulation 2-6-409.3; MOP Volume II, Part 3, §4.14)

E. Records

Notwithstanding the specific wording in any requirement, all records for federally enforceable requirements shall be maintained for at least five years from the date of entry. (Regulation 2-6-501, Regulation 3; MOP Volume II, Part 3, §4.7)

F. Monitoring Reports

Reports of all required monitoring must be submitted to the District at least once every six months, except where an applicable requirement specifies more frequent reporting. The first reporting period for this permit shall be January 7, 2000 to June 30, 2000. The report shall be submitted by July 31, 2000. Subsequent reports shall be for the following periods: January 1st through June 30th and July 1st through December 31st, and are due on the last

I. Standard Conditions

day of the month after the end of the reporting period. All instances of non-compliance shall be clearly identified in these reports. The reports shall be certified by the responsible official as true, accurate, and complete. In addition, all instances of non-compliance with the permit shall be reported in writing to the District's Compliance and Enforcement Division within 10 calendar days of the discovery of the incident. Within 30 calendar days of the discovery of any incident of non-compliance, the facility shall submit a written report including the probable cause of non-compliance and any corrective or preventative actions. The reports shall be sent to the following address:

Director of Compliance and Enforcement
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109
Attn: Title V Reports

(Regulation 2-6-502, Regulation 3; MOP Volume II, Part 3, §4.7)

G. Compliance Certification

Compliance certifications shall be submitted annually by the responsible official of this facility to the Bay Area Air Quality Management District and to the Environmental Protection Agency. The certification period will be January 1st to December 31st. The certification shall be submitted by January 31st of the following year. The certification must list each applicable requirement, the compliance status, whether compliance was continuous or intermittent, the method used to determine compliance, and any other specific information required by the permit. The permit holder may satisfy this requirement through submittal of District-generated Compliance Certification forms. The certification should be directed to the District's Compliance and Enforcement Division at the address above, and a copy of the certification should be sent to the Environmental Protection Agency at the following address:

Director of the Air Division
USEPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105
Attention: Air-3

(MOP Volume II, Part 3, §4.5 and 4.15)

H. Emergency Provisions

1. The permit holder may seek relief from enforcement action in the event of a breakdown, as defined by Regulation 1-208 of the District's Rules and Regulations, by following the procedures contained in Regulations 1-431 and 1-432. The District will thereafter determine whether breakdown relief will be granted in accordance with

I. Standard Conditions

Regulation 1-433. (MOP Volume II, Part 3, §4.8)

2. The permit holder may seek relief from enforcement action for a violation of any of the terms and conditions of this permit caused by conditions beyond the permit holder's reasonable control by applying to the District's Hearing Board for a variance pursuant to Health and Safety Code Section 42350. The Hearing Board will determine after notice and hearing whether variance relief should be granted in accordance with the procedures and standards set forth in Health and Safety Code Section 42350 et seq. Any variance granted by the Hearing Board from any term or condition of this permit which lasts longer than 90 days will be subject to EPA approval. (MOP Volume II, Part 3, §4.8)
3. Notwithstanding the foregoing, the granting by the District of breakdown relief or the issuance by the Hearing Board of a variance will not provide relief from federal enforcement. (MOP Volume II, Part 3, §4.8)

I. Severability

In the event that any provision of this permit is invalidated by a court or tribunal of competent jurisdiction, or by the Administrator of the EPA, all remaining portions of the permit shall remain in full force and effect. (Regulation 2-6-409.5; MOP Volume II, Part 3, §4.10)

II. Equipment

II. EQUIPMENT

Table II A - Permitted Sources

Each of the following sources has been issued a permit to operate pursuant to the requirements of BAAQMD Regulation 2, Permits.

| S-# | Description | Make or Type | Model | Capacity |
|-----|---------------------------|--------------|------------|------------------|
| 1 | Curing/Drying Oven #3 | Natural Gas | Wagner 4-4 | 8700K btu/hr |
| 2 | Curing/Drying Oven #2 | Natural Gas | Wagner | 4100 K btu/hr |
| 3 | Curing/Drying Oven #1 | Natural Gas | Wagner | 4100 K btu/hr |
| 10 | Tank-Water Based Enamel | Above Ground | Aluminum | 10 K gal |
| 11 | Tank-Water Based Enamel | Above Ground | Aluminum | 10 K gal |
| 12 | Tank-End Sealing Compound | Above Ground | Aluminum | 9400 gal |
| 13 | Tank-End Sealing Compound | Above Ground | Aluminum | 564 gal |
| 14 | Roller Coater #3 | Wagner | | |
| 15 | Roller Coater #2 | Wagner | | |
| 16 | Roller Coater #1 | Wagner | | |
| 37 | Multi-Die Press #11 | Crown | 62 | 120 units/minute |
| 38 | Multi-Die Press #12 | Crown | 62 | 120 units/minute |
| 39 | Multi-Die Press #13 | Crown | 62 | 120 units/minute |
| 40 | Multi-Die Press #14 | Crown | 62 | 120 units/minute |

Table II B - Abatement Devices

| A-# | Description | Source(s) Controlled | Applicable Requirement | Operating Parameters | Limit or Efficiency |
|-----|-----------------------|-------------------------|---------------------------|--|------------------------|
| 1 | APCO Incinerator | S1, S14 | 8-11-302 | Required for coating usage not complying with 8-11-301 | 90% |
| 2 | Hirt Fume Incinerator | S2, S3, S15, S16 | 8-11-302 | Required for coating usage not complying with 8-11-301 | 90% |

III. GENERALLY APPLICABLE REQUIREMENTS

The permit holder shall comply with all applicable requirements, including those specified in the BAAQMD and SIP Rules and Regulations and other federal requirements cited below. These requirements apply in a general manner to the facility and/or to sources exempt from the requirement to obtain a District Permit to Operate. The District has determined that these requirements would not be violated under normal, routine operations, and that no additional periodic monitoring or reporting to demonstrate compliance is warranted. In cases where a requirement, in addition to being generally applicable, is also specifically applicable to one or more sources, the requirement and the source are also included in Section IV, Source-Specific Applicable Requirements, of this permit.

The dates in parenthesis in the Title column identify the versions of the regulations being cited and are, as applicable:

1. BAAQMD regulation(s): The date(s) of adoption or most recent amendment of the regulation by the District Board
2. Any federal requirement, including a version of a District regulation that has been approved into the SIP: The most recent date of EPA approval of any portion of the rule, encompassing all actions on the rule through that date

The full language of SIP requirements is included in Appendix A of this permit if the SIP requirement is different from the current BAAQMD requirement.

NOTE:

There are differences between the current BAAQMD rule and the version of the rule in the SIP. For specific information, contact the District's Rule Development Section of the Enforcement Division. All sources must comply with both versions of the rule until US EPA has reviewed and approved the District's revision of the regulation.

Table III
Generally Applicable Requirements

| Applicable Requirement | Regulation Title or Description of Requirement | Federally Enforceable (Y/N) |
|-----------------------------|---|-----------------------------|
| BAAQMD Regulation 1 | General Provisions and Definitions (10/7/98) | N |
| SIP Regulation 1 | General Provisions and Definitions (8/27/99) | Y |
| BAAQMD Regulation 4 | Air Pollution Episode Plan (3/20/91) | N |
| SIP Regulation 4 | Air Pollution Episode Plan (8/06/90) | Y |
| BAAQMD Regulation 5 | Open Burning (11/2/94) | N |
| BAAQMD Regulation 6 | Particulate Matter and Visible Emissions (12/19/90) | N |
| BAAQMD Regulation 7 | Odorous Substances (3/17/82) | N |
| BAAQMD Regulation 8, Rule 1 | Organic Compounds - General Provisions (6/15/94) | Y |

III. Generally Applicable Requirements

Table III
Generally Applicable Requirements

| Applicable Requirement | Regulation Title or Description of Requirement | Federally Enforceable (Y/N) |
|-------------------------------|--|------------------------------------|
| BAAQMD Regulation 8, Rule 3 | Organic Compounds - Architectural Coatings (12/20/95) | Y |
| BAAQMD Regulation 8, Rule 49 | Organic Compounds - Aerosol Paint Products (12/20/95) | N |
| SIP Regulation 8, Rule 49 | Organic Compounds - Aerosol Paint Products (3/22/95) | Y |
| BAAQMD Regulation 8, Rule 51 | Organic Compounds - Adhesive and Sealant Products (12/20/95) | N |
| BAAQMD Regulation 11, Rule 2 | Hazardous Pollutants - Asbestos Demolition, Renovation and Manufacturing (12/4/91) | Y |
| BAAQMD Regulation 12, Rule 4 | Miscellaneous Standards of Performance - Sandblasting (7/11/90) | Y |

IV. SOURCE-SPECIFIC APPLICABLE REQUIREMENTS

The permit holder shall comply with all applicable requirements, including those specified in the BAAQMD and SIP Rules and Regulations and other federal requirements cited below. The requirements cited in the following tables apply in a specific manner to the indicated source(s).

The dates in parenthesis in the Title column identify the versions of the regulations being cited and are, as applicable:

1. BAAQMD regulation(s): The date(s) of adoption or most recent amendment of the regulation by the District Board
2. Any federal requirement, including a version of a District regulation that has been approved into the SIP: The most recent date of EPA approval of any portion of the rule, encompassing all actions on the rule through that date

The full text of each permit condition cited is included in Section V, Permit Conditions, of this permit. The full language of SIP requirements is included in Appendix A of this permit if the SIP requirements are different from the current BAAQMD requirements. All other text may be found in the regulations themselves.

Table IV - A
Source-specific Applicable Requirements
S1– CURING/DRYING OVEN #3

| Applicable Requirement | Regulation Title or Description of Requirement | Federally Enforceable (Y/N) | Future Effective Date |
|-------------------------------------|---|-----------------------------|-----------------------|
| BAAQMD Regulation 8, Rule 11 | Organic Compounds – Metal Container, Closure and Coil Coating (11/19/97) | | |
| 8-11-301 | Metal Container or Closure Coating Limitations | | |
| 8-11-301.1 | VOC Limit – Sheet Basecoat and Overvarnish Limitation | Y | |
| 8-11-302 | Emission Control Device Requirement (Optional) | Y | |
| 8-11-305 | Alternate Emission Control Plan (Optional) | Y | |
| 8-11-402 | Operation and Maintenance Plan | Y | |
| 8-11-503 | Alternate Emission Control Plan Records (Optional) | Y | |
| 8-11-504 | Afterburner Temperature Monitoring | Y | |
| BAAQMD Condition #2008 | | | |
| part 1 | Facility-wide emission limit (cumulative increase) | Y | |
| part 5 | Recordkeeping (cumulative increase, 8-11-501) | Y | |

IV. Source-specific Applicable Requirements

Table IV - A
Source-specific Applicable Requirements
S1 – CURING/DRYING OVEN #3

| Applicable Requirement | Regulation Title or Description of Requirement | Federally Enforceable (Y/N) | Future Effective Date |
|-------------------------------|--|-----------------------------|-----------------------|
| BAAQMD Condition #2417 | | | |
| part 2 | Afterburner Requirement (BACT) | Y | |
| part 3 | Incinerator Temperature, Abatement Efficiency (BACT) | Y | |
| part 4 | Incinerator Temperature Recordkeeping (BACT) | Y | |
| part 5 | Source Test (BACT) | Y | |
| part 6 | Capture Efficiency – Face Velocity (Cumulative Increase, BACT) | Y | |
| part 7 | Allowable Temperature Excursions (basis: Regulation 2-1-403) | Y | |
| part 8 | Temperature Excursion Records (basis: Regulation 2-1-403) | Y | |
| part 9 | Temperature Excursion Definition (basis: Regulation 2-1-403) | Y | |

Table IV - B
Source-specific Applicable Requirements
S2, S3 – CURING/DRYING OVENS #1-2

| Applicable Requirement | Regulation Title or Description of Requirement | Federally Enforceable (Y/N) | Future Effective Date |
|-------------------------------------|---|-----------------------------|-----------------------|
| BAAQMD Regulation 8, Rule 11 | Organic Compounds – Metal Container, Closure and Coil Coating (11/19/97) | | |
| 8-11-301 | Metal Container or Closure Coating Limitations | | |
| 8-11-301.1 | VOC Limit – Sheet Basecoat and Overvarnish Limitation | Y | |
| 8-11-302 | Emission Control Device Requirement (Optional) | Y | |
| 8-11-305 | Alternate Emission Control Plan (Optional) | Y | |
| 8-11-402 | Operation and Maintenance Plan | Y | |
| 8-11-503 | Alternate Emission Control Plan Records (Optional) | Y | |
| 8-11-504 | Afterburner Temperature Monitoring | Y | |

IV. Source-specific Applicable Requirements

Table IV - B
Source-specific Applicable Requirements
S2, S3 – CURING/DRYING OVENS #1-2

| Applicable Requirement | Regulation Title or Description of Requirement | Federally Enforceable (Y/N) | Future Effective Date |
|-------------------------------|--|-----------------------------|-----------------------|
| BAAQMD Condition #2008 | | | |
| part 1 | Facility-wide emission limit (cumulative increase) | Y | |
| part 5 | Recordkeeping (cumulative increase, 8-11-501) | Y | |
| BAAQMD Condition #2417 | | | |
| part 1 | Afterburner Requirement (BACT) | Y | |
| part 3 | Incinerator Temperature, Abatement Efficiency (BACT) | Y | |
| part 4 | Incinerator Temperature Recordkeeping (BACT) | Y | |
| part 5 | Source Test (BACT) | Y | |
| part 6 | Capture Efficiency – Face Velocity (Cumulative Increase, BACT) | Y | |
| part 7 | Allowable Temperature Excursions (basis: Regulation 2-1-403) | Y | |
| part 8 | Temperature Excursion Records (basis: Regulation 2-1-403) | Y | |
| part 9 | Temperature Excursion Definition (basis: Regulation 2-1-403) | Y | |

IV. Source-specific Applicable Requirements

Table IV – C
Source-specific Applicable Requirements
S10, S11, S13 – ABOVEGROUND TANKS

| Applicable Requirement | Regulation Title or Description of Requirement | Federally Enforceable (Y/N) | Future Effective Date |
|------------------------------------|---|------------------------------------|------------------------------|
| BAAQMD Regulation 8, Rule 5 | Storage or Organic Liquids (1/1/93) | | |
| 8-5-501 | Records | Y | |
| BAAQMD Condition #2008 | | | |
| Part 1 | Facility-wide emission limit (cumulative increase) | Y | |
| Part 5 | Recordkeeping (cumulative increase, 8-11-501) | Y | |

IV. Source-specific Applicable Requirements

Table IV – D
Source-specific Applicable Requirements
S12– ABOVE GROUND TANK

| Applicable Requirement | Regulation Title or Description of Requirement | Federally Enforceable (Y/N) | Future Effective Date |
|------------------------------------|--|-----------------------------|-----------------------|
| BAAQMD Regulation 8, Rule 5 | Storage or Organic Liquids (1/1/93) | | |
| 8-5-301 | Storage Tanks Smaller than 150 cubic meters | Y | |
| 8-5-301.1 | Submerged fill pipe | Y | |
| 8-5-501 | Records | Y | |
| BAAQMD Condition #2008 | | | |
| Part 1 | Facility-wide emission limit (cumulative increase) | Y | |
| Part 5 | Recordkeeping (cumulative increase, 8-11-501) | Y | |

Table IV –E
Source-specific Applicable Requirements
S14 – ROLLER COATERS

| Applicable Requirement | Regulation Title or Description of Requirement | Federally Enforceable (Y/N) | Future Effective Date |
|-------------------------------------|---|-----------------------------|-----------------------|
| BAAQMD Regulation 8, Rule 11 | Organic Compounds – Metal Container, Closure and Coil Coating (11/19/97) | | |
| 8-11-301 | Metal Container, Closure and Coil Coating Standards | | |
| 8-11-301.1 | VOC Limit – Sheet Basecoat and Overvarnish Limitation | Y | |
| 8-11-302 | Emission Control Device Requirement (Optional) | Y | |
| 8-11-305 | Alternate Emission Control Plan (Optional) | Y | |
| 8-11-306 | Surface Preparation and Cleanup solvent | Y | |
| 8-11-402 | Operation and Maintenance Plan | Y | |

IV. Source-specific Applicable Requirements

Table IV –E
Source-specific Applicable Requirements
S14 – ROLLER COATERS

| Applicable Requirement | Regulation Title or Description of Requirement | Federally Enforceable (Y/N) | Future Effective Date |
|-------------------------------|--|------------------------------------|------------------------------|
| 8-11-501 | Coating Records | Y | |
| 8-11-503 | Alternate Emission Control Plan Records (Optional) | Y | |
| 8-11-504 | Afterburner Temperature Monitoring | Y | |
| BAAQMD Condition #2008 | | | |
| Part 1 | Facility-wide Emissions Limit(cumulative increase) | Y | |
| Part 5 | Recordkeeping (cumulative increase, 8-11-501) | Y | |
| BAAQMD Condition #2417 | | | |
| part 2 | Afterburner Requirement (BACT) | Y | |
| part 3 | Incinerator Temperature, Abatement Efficiency (BACT) | Y | |
| part 4 | Incinerator Temperature Recordkeeping (BACT) | Y | |
| part 5 | Source Test (BACT) | Y | |
| part 6 | Capture Efficiency – Face Velocity (Cumulative Increase, BACT) | Y | |
| part 7 | Allowable Temperature Excursions (basis: Regulation 2-1-403) | Y | |
| part 8 | Temperature Excursion Records (basis: Regulation 2-1-403) | Y | |
| part 9 | Temperature Excursion Definition (basis: Regulation 2-1-403) | Y | |

IV. Source-specific Applicable Requirements

Table IV –F
Source-specific Applicable Requirements
S15, S16 – ROLLER COATERS

| Applicable Requirement | Regulation Title or Description of Requirement | Federally Enforceable (Y/N) | Future Effective Date |
|-------------------------------------|---|-----------------------------|-----------------------|
| BAAQMD Regulation 8, Rule 11 | Organic Compounds – Metal Container, Closure and Coil Coating (11/19/97) | | |
| 8-11-301 | Metal Container, Closure and Coil Coating Standards | | |
| 8-11-301.1 | VOC Limit – Sheet Basecoat and Overvarnish Limitation | Y | |
| 8-11-302 | Emission Control Device Requirement (Optional) | Y | |
| 8-11-305 | Alternate Emission Control Plan (Optional) | Y | |
| 8-11-306 | Surface Preparation and Cleanup solvent | Y | |
| 8-11-402 | Operation and Maintenance Plan | Y | |
| 8-11-501 | Coating Records | Y | |
| 8-11-503 | Alternate Emission Control Plan Records (Optional) | Y | |
| 8-11-504 | Afterburner Temperature Monitoring | Y | |
| BAAQMD Condition #2008 | | | |
| Part 1 | Facility-wide Emissions Limit(cumulative increase) | Y | |
| Part 5 | Recordkeeping (cumulative increase, 8-11-501) | Y | |
| BAAQMD Condition #2417 | | | |
| part 1 | Afterburner Requirement (BACT) | Y | |
| part 3 | Incinerator Temperature, Abatement Efficiency (BACT) | Y | |
| part 4 | Incinerator Temperature Recordkeeping (BACT) | Y | |
| part 5 | Source Test (BACT) | Y | |
| part 6 | Capture Efficiency – Face Velocity (Cumulative Increase, BACT) | Y | |
| part 7 | Allowable Temperature Excursions (basis: Regulation 2-1-403) | Y | |
| part 8 | Temperature Excursion Records (basis: Regulation 2-1-403) | Y | |
| part 9 | Temperature Excursion Definition (basis: Regulation 2-1-403) | Y | |

IV. Source-specific Applicable Requirements

IV. Source-specific Applicable Requirements

Table IV – G
Source-specific Applicable Requirements
S37, S38, S39, S40 – PRESSES

| Applicable Requirement | Regulation Title or Description of Requirement | Federally Enforceable (Y/N) | Future Effective Date |
|-------------------------------------|---|------------------------------------|------------------------------|
| BAAQMD Regulation 8, Rule 11 | Organic compounds – Metal Container, Closure and Coil Coating (11/19/97) | | |
| 8-11-301 | Metal Container or Closure Coating Limitations | | |
| 8-11-301.6.1 | End Sealing Compound | Y | |
| 8-11-301.6.1 | End Sealing Compound | N | 1/1/2002 |
| 8-11-302 | Emission Control Device (Optional) | Y | |
| 8-11-305 | Alternative Emission Control Plan (Optional) | Y | |
| 8-11-306 | Surface Preparation and Cleanup Solvent | Y | |
| 8-11-402 | Operation and Maintenance Plan | Y | |
| 8-11-501 | Coating Records | Y | |
| 8-11-503 | Alternate Emission Control Plan Records (Optional) | Y | |
| 8-11-504 | Afterburner Temperature Monitoring | Y | |
| SIP Regulation 8, Rule 11 | Organic compounds – Metal Container, Closure and Coil Coating (12/23/97) | | |
| 8-11-301 | Metal Container or Closure Coating Limitations | Y | |
| 8-11-301.6 | End Sealing Compound | Y | |
| BAAQMD Condition #2008 | Limits Total Facility VOC Emissions | | |
| Part 1 | Facility-wide emission limit (cumulative increase) | Y | |
| Part 5 | Recordkeeping (cumulative increase, 8-11-501) | Y | |

V. SCHEDULE OF COMPLIANCE

The permit holder shall comply with all applicable requirements cited in this permit. The permit holder shall also comply with applicable requirements that become effective during the term of this permit.

VI. PERMIT CONDITIONS

Any condition that is preceded by an asterisk is not federally enforceable.

Condition #2008

For S1-S3, DRYING OVENS; S10-S13, TANKS; S14-S16, ROLLER COATERS; S37-S40, Multi-Die Presses

- 1) The total annual VOC emissions from the entire Crown Cork and Seal Co., Incorporated facility (plant #9814) shall not exceed 203.55 tons during any consecutive twelve month period. (cumulative increase)
- 2) (Deleted via administrative permit amendment-January, 2000.)
- 3) (Deleted via administrative permit amendment-January, 2000.)
- 4) (Deleted via administrative permit amendment-January, 2000.)
- 5) Daily records of all coating usage shall be recorded in a District-approved log and retained on-site for a minimum of five years from the date of entry. These records shall be made available to District representatives upon request and shall include the following:
(Cumulative increase, Regulation 8-11)
 - a. source number
 - b. coating type
 - c. coating usage
 - d. coating VOC content (as-applied)
 - e. abatement control efficiency (if applicable)
 - f. daily source VOC emissions
 - g. total daily facility-wide VOC emissions
 - h. monthly total facility-wide VOC emissions

VI. Permit Conditions

Condition # 2417

For S1- DRYING OVEN, S2 – DRYING OVEN, S3 – DRYING OVEN, S14 – ROLLER COATER, S15 – ROLLER COATER, AND S16 – ROLLER COATER:

- 1) Coater #1 and #2 (S16 and S15) and Coating Line Ovens #1 and #2 (S3 and S2) shall be vented at all times to the properly operating and properly maintained A2 Hirt Fume Incinerator. (BACT)
- 2) Coater #3 (S14) and Coating Line Oven #3 (S1) shall be vented at all times to the properly operating and properly maintained A1 APCO Fume Incinerator. (BACT)
- 3) Both the A1 APCO Fume Incinerator and the A2 Hirt Fume Incinerator shall maintain a minimum combustion chamber temperature of 1400 degrees F and a minimum overall abatement efficiency of 90% when abating emissions from non-compliant, solvent-borne coatings. (BACT)
- 4) Crown Cork and Seal Co., Inc. shall maintain records of daily continuous temperature measurements and current abatement efficiency test results for both A1 APCO Fume Incinerator and A2 Hirt Fume Incinerator. These records shall be retained on-site for a minimum of five years from the date of entry and made available to District representatives upon request. (BACT)
- 5) Crown Cork and Seal Co., Inc. shall conduct yearly capture and destruction efficiency source tests on A1 APCO Fume Incinerator and A2 Hirt Fume Incinerator at 1400 degrees F. Copies of the source test results shall be submitted to the District Permit Services Division within 90 days of the test date. (BACT)
- 6) To ensure emissions capture, the average intake flow velocities (face velocity) at each emissions collection point for these sources shall meet the following limits:
 - a. S1, Curing/Drying Oven #3: 600 ft/min
 - b. S2, Curing/Drying Oven #2: 217 ft/min
 - c. S3, Curing/Drying Oven #1: 150 ft/min
 - d. S14, Roller Coater #3: 143 ft/min
 - e. S15, Roller Coater #2: 87 ft/min
 - f. S16, Roller Coater #1: 75 ft/min

The owner/operator shall procure a semiannual source test to verify the face velocity at each

VI. Permit Conditions

collection point. (Basis: Regulation 2-6-501)

VI. Permit Conditions

Condition # 2417

For S1- DRYING OVEN, S2 – DRYING OVEN, S3 – DRYING OVEN , S14 – ROLLER COATER, S15 – ROLLER COATER, AND S16 – ROLLER COATER:

- 7) The temperature limit in part 3 shall not apply during an “Allowable Temperature Excursion”, provided that the temperature controller setpoint complies with the temperature limit. An Allowable Temperature Excursion is one of the following:
- a. A temperature excursion not exceeding 20 degrees F; or
 - b. A temperature excursion for a period or periods which when combined are less than or equal to 15 minutes in any hour; or
 - c. A temperature excursion for a period or periods which when combined are more than 15 minutes in any hour, provided that all three of the following criteria are met.
 - i. the excursion does not exceed 50 degrees F;
 - ii. the duration of the excursion does not exceed 24 hours; and
 - iii. the total number of such excursions does not exceed 12 per calendar year (or any consecutive 12 month period).

Two or more excursions greater than 15 minutes in duration occurring during the same 24-hour period shall be counted as one excursion toward the 12 excursion limit. (basis: Regulation 2-1-403)

8. For each Allowable Temperature Excursion that exceeds 20 degrees F. and 15 minutes in duration, the Permit Holder shall keep sufficient records to demonstrate that they meet the qualifying criteria described above. Records shall be retained for a minimum of five years from the date of entry, and shall be made available to the District upon request. Records shall include at least the following information:
- a. Temperature controller setpoint;
 - b. Starting date and time, and duration of each Allowable Temperature Excursion;
 - c. Measured temperature during each Allowable Temperature Excursion;
 - d. Number of Allowable Temperature Excursions per month, and total number for the current calendar year; and
 - e. All strip charts or other temperature records.
- (basis: Regulation 2-1-403)
9. For the purposes of parts 7 and 8, a temperature excursion refers only to temperatures below the limit. (basis: Regulation 2-1-403)

VII. APPLICABLE LIMITS & COMPLIANCE MONITORING REQUIREMENTS

This section has been included only to summarize the applicable emission limits contained in Section IV, Source-Specific Applicable Requirements, of this permit. The following tables show the relationship between each emission limit and the associated compliance monitoring provisions, if any. The monitoring frequency indicates whether periodic (P) or continuous (C) monitoring is required. For periodic monitoring, the frequency of the monitoring has also been shown, either annual (A), quarterly (Q), monthly (M), daily (D), or on an event basis (E). No monitoring (N) has been required if the current applicable rule or regulation does not require monitoring, and the operation is unlikely to deviate from the applicable emission limit based upon the nature of the operation.

Table VII – A
Applicable Limits and Compliance Monitoring Requirements
S1-S3 – CURING/DRYING OVENS #1-3

| Type of limit | Emission Limit Citation | FE Y/N | Future Effective Date | Emission Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type |
|---------------|--------------------------------|--------|-----------------------|--|--------------------------------------|------------------------------|-------------------------------|
| VOC | BAAQMD 8-11-302 | Y | | 90 % destruction efficiency for abatement device | BAAQMD Condition #2417, part 6 | P/A | Source Test |
| | BAAQMD 8-11-302 | Y | | 90 % destruction efficiency for abatement device | BAAQMD 8-11-504 | C | Temperature Recorder |
| | BAAQMD Condition #2008, part 1 | Y | | 203.55 tons/yr, facility limit | BAAQMD Condition #2008, part 5 | P/D | Coating Records |
| VOC | BAAQMD Condition #2417, part 3 | Y | | Minimum combustion temperature of 1400 F | BAAQMD Condition #2417, parts 4, 7-9 | C | Temperature Recorder, records |
| | BAAQMD Condition #2417, part 3 | Y | | 90% overall abatement efficiency from non-compliant solvent borne coatings | BAAQMD Condition #2417, parts 4, 7-9 | C | Temperature Recorder, records |

VII. Applicable Limits and Compliance Monitoring Requirements

Table VII – A
Applicable Limits and Compliance Monitoring Requirements
S1-S3 – CURING/DRYING OVENS #1-3

| Type of limit | Emission Limit Citation | FE Y/N | Future Effective Date | Emission Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type |
|---------------|--------------------------------|--------|-----------------------|---|---------------------------------------|------------------------------|--------------------------|
| VOC | BAAQMD Condition #2417, part 3 | Y | | 90% overall abatement efficiency from non-compliant solvent borne coatings | BAAQMD Condition #2417, part 6 | P/semi-annual | face velocity monitoring |
| | BAAQMD Condition #2417, part 3 | Y | | 90% overall abatement efficiency for non-compliant solvent borne coatings | BAAQMD Condition #2417, parts 5 and 6 | P/A | Source Test |
| VOC | BAAQMD Condition #2417, part 6 | Y | | Average face velocity greater than or equal to: S1: 600 ft/min S2: 217 ft/min S3: 150 ft/min | BAAQMD Condition #2417, part 6 | P/twice per year | Source Test |

Table VII – B
Applicable Limits and Compliance Monitoring Requirements
S10-S13, ABOVEGROUND TANKS

| Type of limit | Emission Limit Citation | FE Y/N | Future Effective Date | Emission Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type |
|---------------|--------------------------------|--------|-----------------------|--------------------------------|---------------------------------|------------------------------|-----------------|
| VOC | BAAQMD Condition #2008, part 1 | Y | | 203.55 tons/yr, facility limit | BAAQMD Condition #2008, part 5 | P/D | Coating Records |

VII. Applicable Limits and Compliance Monitoring Requirements

Table VII – C
Applicable Limits and Compliance Monitoring Requirements
S14, S15, S16 – ROLLER COATERS

| Type of limit | Emission Limit Citation | FE Y/N | Future Effective Date | Emission Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type |
|---------------|--------------------------------|--------|-----------------------|--|--------------------------------------|------------------------------|-------------------------------|
| VOC | BAAQMD 8-11-301.1 | Y | | Sheet basecoat (interior and exterior) and overvarnish: (1.9 lb/gal) of coating applied, excluding water | BAAQMD 8-11-501 | P/D | Coating Records |
| | BAAQMD 8-11-302 | Y | | 90 % destruction efficiency for abatement device | BAAQMD Condition #2417, part 6 | P/A | Source Test |
| | BAAQMD 8-11-302 | Y | | 90 % destruction efficiency for abatement device | BAAQMD 8-11-504 | C | Temperature Recorder |
| | BAAQMD Condition #2008, part 1 | Y | | 203.55 tons/yr, facility limit | BAAQMD Condition #2008, part 5 | P/D | Coating Records |
| | BAAQMD Condition #2417, part 3 | Y | | Minimum combustion temperature of 1400 F | BAAQMD Condition #2417, parts 4, 7-9 | C | Temperature Recorder, records |
| | BAAQMD Condition #2417, part 3 | Y | | 90% overall abatement efficiency from non-compliant solvent borne coatings | BAAQMD Condition #2417, parts 4, 7-9 | C | Temperature Recorder, records |
| | BAAQMD Condition #2417, part 3 | Y | | 90% overall abatement efficiency from non-compliant solvent borne coatings | BAAQMD Condition #2417, part 6 | P/semi-annual | face velocity monitoring |

VII. Applicable Limits and Compliance Monitoring Requirements

Table VII – C
Applicable Limits and Compliance Monitoring Requirements
S14, S15, S16 – ROLLER COATERS

| Type of limit | Emission Limit Citation | FE Y/N | Future Effective Date | Emission Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type |
|---------------|--------------------------------|--------|-----------------------|---|---------------------------------------|------------------------------|-----------------|
| | BAAQMD Condition #2417, part 3 | Y | | 90% overall abatement efficiency for non-compliant solvent borne coatings | BAAQMD Condition #2417, parts 6 and 7 | P/A | Source Test |
| VOC | BAAQMD Condition #2417, Part 6 | Y | | Average face velocity greater than or equal to: S14: 143 ft/min S15: 87 ft/min S16: 75 ft/min | BAAQMD Condition # 2417, Part 6 | P/twice per year | Source Test |

VII. Applicable Limits and Compliance Monitoring Requirements

Table VII – D
Applicable Limits and Compliance Monitoring Requirements
S37, S38, S39, S40 – PRESSES

| Type of limit | Emission Limit Citation | FE Y/N | Future Effective Date | Emission Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type |
|---------------|---------------------------------|--------|-----------------------|--|---------------------------------|------------------------------|-------------------------------|
| VOC | BAAQMD 8-11-301.6.1 | Y | | End sealing compound < 3.7 lb/gal | BAAQMD 8-11-501 | P/D | Coating Records |
| | BAAQMD 8-11-301.6.1 | N | 1/1/2002 | End sealing compound < 0.1 lb/gal | BAAQMD 8-11-501 | P/D | Coating Records |
| | SIP 8-11-301.6 | Y | | End sealing compound < 3.7 lb/gal | BAAQMD 8-11-501 | P/D | Coating Records |
| | BAAQMD 8-11-302 | Y | | 90% Destruction Efficiency | BAAQMD 8-11-504 | C | temperature recorder, records |
| | BAAQMD 8-11-302 | Y | | 90% Destruction Efficiency | Condition # 2417, Parts 4, 7-9 | C | temperature recorder, records |
| | BAAQMD 8-11-302 | Y | | 90% Destruction Efficiency | Condition # 2417, Parts 5 and 6 | P/A | Source Test |
| | BAAQMD Condition #2008, part 1 | Y | | 203.55 tons/yr, facility limit | Condition #2008, part 5 | P/D | Coating Records |
| | BAAQMD Condition # 2417, Part 3 | Y | | 90 % abatement efficiency | Condition # 2417, Parts 5 and 6 | P/A | Source Test |
| | BAAQMD Condition # 2417, Part 3 | Y | | 1400 degrees F temperature requirement | Condition # 2417, Parts 4, 7-9 | C | Temperature Recorder |

VIII. TEST METHODS

The test methods associated with the emission limit of a District regulation are generally found in Section 600 of the regulation. The following table indicates only the test methods associated with the emission limits referenced in Section VII, Applicable Emission Limits & Compliance Monitoring Requirements, of this permit.

Table VIII
Test Methods

| Applicable Requirement | Description of Requirement | Acceptable Test Methods | SIP Approved |
|----------------------------|--|---|--------------|
| BAAQMD 8-11-301.1 | Basecoat (Interior and exterior) / Overvarnish VOC Limit | Manual of Procedures, Volume III, Method 21, Determination of Compliance of Volatile Organic Compounds for Water Reducible Coatings <u>or</u> Method 22, Determination of Compliance of Volatile Organic Compounds for Solvent Based Coatings, Inks and Other Related Products | Y |
| BAAQMD 8-11-302 | Emission Control Device Limitation | Manual of Procedures, Volume IV, ST-7, "Organic Compounds" <u>or</u> EPA Method 25 "Determination of Total Gaseous Nonmethane Organic Emissions as Carbon" <u>or</u> 25A "Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer" | Y |
| BAAQMD Cond. #2417, part 3 | Incinerator Abatement Control Efficiency | Manual of Procedures, Volume IV, ST-7, "Organic Compounds" <u>or</u> EPA Method 25 "Determination of Total Gaseous Nonmethane Organic Emissions as Carbon" <u>or</u> 25A "Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer" | Y |

IX. PERMIT SHIELD

A. Non-applicable Requirements

Pursuant to District Regulations 2-6-233 and 2-6-409.12, the federally enforceable regulations and/or standards cited in the following table[s] are not applicable to the source or group of sources identified at the top of the table[s]. Enforcement actions and litigation may not be initiated against the source or group of sources covered by this shield based on the regulatory and/or statutory provisions cited, as long as the reasons listed below remain valid for the source or group of sources covered by this shield.

Table IX A – 1
Permit Shield for Non-applicable Requirements
S10, S11 – ABOVE GROUND TANKS

| Citation | Title or Description (Reason not applicable) |
|---|--|
| BAAQMD Regulation 8, Rule 5 - 301 | Storage of Organic Liquids (The requirement does not apply to storage of liquids having a vapor pressure < 25.8 mm Hg (0.5 psia)) |

Table IX A – 2
Permit Shield for Non-applicable Requirements
S13 – ABOVE GROUND TANK

| Citation | Title or Description (Reason not applicable) |
|---|--|
| BAAQMD Regulation 8, Rule 5 - 301 | Storage of Organic Liquids (The requirement does not apply to tanks installed prior to January 4, 1967, which are not used for storage of gasoline to be dispensed to internal combustion engine fuel tanks, and has a capacity of less than 2008 gal.) |

Table IX A - 3
Permit Shield for Non-applicable Requirements
S1, S2, S3, – OVENS

| Citation | Title or Description (Reason not applicable) |
|------------------------------|---|
| BAAQMD Regulation 9- 7 | BAAQMD Regulation 9, Rule 7 – Nitrogen Oxides and Carbon Monoxide From Industrial, Institutional and Commercial Boilers, Steam Generators and Process Heaters. (The rule does not apply to ovens; 9-7-110.6) |

X. GLOSSARY

BAAQMD

Bay Area Air Quality Management District

BACT

Best Available Control Technology

CAA

The federal Clean Air Act

CAAQS

California Ambient Air Quality Standards

CEQA

California Environmental Quality Act

CFR

The Code of Federal Regulations. 40 CFR contains the implementing regulations for federal environmental statutes such as the Clean Air Act. Parts 50-99 of 40 CFR contain the requirements for air pollution programs.

CO

Carbon Monoxide

Cumulative Increase

The sum of permitted emissions from each new or modified source since a specified date pursuant to BAAQMD Rule 2-1-403, Permit Conditions (as amended by the District Board on 7/17/91) and SIP Rule 2-1-403, Permit Conditions (as approved by EPA on 6/23/95). Used to determine whether threshold-based requirements are triggered.

District

The Bay Area Air Quality Management District

EPA

The federal Environmental Protection Agency.

Excluded

Not subject to any District Regulations.

FE, Federally Enforceable

All limitations and conditions which are enforceable by the Administrator of the EPA including those requirements developed pursuant to 40 CFR Part 51, subpart I (NSR), Part 52.21 (PSD), Part 60, (NPS), Part 61, (NESHAPs), Part 63 (HAP), and Part 72 (Permits Regulation, Acid Rain), and also including limitations and conditions contained in operating permits issued under

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ID: BFC

an EPA-approved program that has been incorporated into the SIP.

X. Glossary

HAP

Hazardous Air Pollutant. Any pollutant listed pursuant to Section 112(b) of the Act. Also refers to the program mandated by Title I, Section 112, of the Act and implemented by both 40 CFR Part 63, and District Regulation 2, Rule 5.

Major Facility

A facility with potential emissions of regulated air pollutants greater than or equal to 100 tons per year, greater than or equal to 10 tons per year of any single hazardous air pollutant, and/or greater than or equal to 25 tons per year of any combination of hazardous air pollutants, or such lesser quantity as determined by the EPA administrator.

MFR

Major Facility Review. The District's term for the federal operating permit program mandated by Title V of the Act and implemented by District Regulation 2, Rule 6.

MOP

The District's Manual of Procedures.

NAAQS

National Ambient Air Quality Standards

NESHAPs

National Emission Standards for Hazardous Air Pollutants. Contained in 40 CFR Part 61.

NMHC

Non-methane Hydrocarbons

NO_x

Oxides of nitrogen.

NSPS

Standards of Performance for New Stationary Sources. Federal standards for emissions from new stationary sources. Mandated by Title I, Section 111 of the Act, and implemented by both 40 CFR Part 60 and District Regulation 10.

NSR

New Source Review. A federal program for pre-construction review and permitting of new and modified sources of air pollutants for which the District is classified "non-attainment". Mandated by Title I of the Clean Air Act and implemented by 40 CFR Parts 51 and 52 as well as District Regulation 2, Rule 2. (Note: There are additional NSR requirements mandated by the California Clean Air Act.)

X. Glossary

Offset Requirement

A New Source Review requirement to provide federally enforceable emission offsets at a specified ratio for the emissions from a new or modified source and any pre-existing cumulative increase minus any onsite contemporaneous emission reduction credits. Applies to emissions of POC, NO_x, PM₁₀, and SO₂.

Phase II Acid Rain Facility

A facility that generates electricity for sale through fossil-fuel combustion and by virtue of certain other characteristics (defined in Regulation 2, Rule 6) is subject to Titles IV and V of the Clean Air Act.

POC

Precursor Organic Compounds

PM

Total Particulate Matter

PM₁₀

Particulate matter with aerodynamic equivalent diameter of less than or equal to 10 microns

PSD

Prevention of Significant Deterioration. A federal program for permitting new and modified sources of air pollutants for which the District is classified "attainment" of the National Air Ambient Quality Standards. Mandated by Title I of the Act and implemented by both 40 CFR Part 52 and District Regulation 2, Rule 2.

SIP

State Implementation Plan. State and District programs and regulations approved by EPA and developed in order to attain the National Air Ambient Quality Standards. Mandated by Title I of the Act.

SO₂

Sulfur dioxide

Title V

Title V of the federal Clean Air Act. Requires a federally enforceable operating permit program for major and certain other facilities.

VOC

Volatile Organic Compounds

X. Glossary

Units of Measure:

| | | |
|----------------|---|----------------------------------|
| bhp | = | brake-horsepower |
| btu | = | British Thermal Unit |
| g | = | grams |
| gal | = | gallon |
| hp | = | horsepower |
| hr | = | hour |
| lb | = | pound |
| in | = | inches |
| max | = | maximum |
| m ² | = | square meter |
| min | = | minute |
| mm | = | million |
| ppmv | = | parts per million, by volume |
| ppmw | = | parts per million, by weight |
| psia | = | pounds per square inch, absolute |
| psig | = | pounds per square inch, gauge |
| scfm | = | standard cubic feet per minute |
| yr | = | year |

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XI. APPLICABLE STATE IMPLEMENTATION PLAN

See Attachments